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Ex. 6 - Personal Privacy

February 17, 2016

Department of Conservation
801 K Street, MS 24-02
Sacramento, CA. 95814

BY: DOC/DOGER

RE: UIC Discussion Draft

The current UIC Program has resulted in an out-of-mind/out-of-sight oil and gas industry timebomb that is constantly ticking. The regulations need to be not only strengthened, but more closely enforced on a daily basis. When violations of rules and regulations occur, serious and prohibitive fines and conditions need to be imposed.

Injectations of "produced" water [water known to be contaminated with hydrocarbons, solvents (some recognized by Prop 65 as cancer-causing); metals; high TDS; arsenic; and at times radioactive substances] should not be classified as "special wastes" – they are in reality "hazardous substances" and should be thus designated as so. Both DOGGR and DOC should insist the 1988 Resource and Recovery Act be updated.

The oil and gas industry should be disallowed from using the dark veil of "trade secrets" to hide the actual content of the injections. These injections have absolutely no influence on commerce.

Injectations of "produced" water into the same levels as agricultural and domestic wells should cease immediately.

Any oil or gas company refusing to provide requested data or information to any Ca. state regulatory agency, or refusing direction from a state agency to cease and desist their injection(s), should be subject a revocation of their business license and to occupation by the Ca. National Guard until compliance with state directives.

Oil and gas companies operating injection wells should be required to provide emergency disaster plans, that include worst-case scenario insurance coverage. It has become too convenient for the oil and gas industry to wait for disaster declarations that use public monies to offset their financial culpability.

The permitting process needs to slow way down. Governor Brown's 2011 beheading of DOGGR in order to achieve "a more flexible approach" to the permitting process relying on historical worksite records is a huge affront to the safety of both oil and gas industry workers, the public, and the environment. In 2012 permits escalated from 50 per/yr. to 1575 per/yr. We should not depend on the oil and gas industry to police themselves. Before any injections are permitted, engineering and geologic studies should be conducted as well as on-site testing to prove beyond any doubt, the waste or storage elements can be contained. Local water wells should also be evaluated for water quality, depth, pressure, and purpose. Kern County's recent Western States Petroleum Association's sponsored zoning change, which basically makes permits as easy to obtain as a wedding license, and uses a blanket county-wide EIR approach to local permitting should be thrown out. Each well should be individually permitted and those permits should be issued by DOGGR.

Before oil and gas wells are repurposed or change ownership, they should be thoroughly inspected by either a state agency or an independent review. Any casing or annal damage; improperly working, antiquated, or unsafe engineering controls; and soil contamination at the well site should be remediated before a change is approved. The recent Aliso Canyon Storage Facility "leak" which in 4 months spewed 80,000 metric tons of methane into our atmosphere is an inexcusable example of how inadequate our current injection well monitoring system is. Even though the gas company's own storage director had alerted the CPUC to Aliso's aging infrastructure (there are 115 wells there), and the "leaking" pipe had not been inspected for over a year or a secondary shut-off valve installed, no agency seemed to be doing much monitoring. Had this site been inspected with remote sensing and imaging, this accident probably would not have occurred. Also the 31,000 residents of Porter Ranch would not have had to experience a deleterious public health, safety, and environmental crisis.

The issue of abandoned or orphaned wells also needs to be addressed. Again, oil and gas companies should be held financially and criminally accountable in the event of any problems due to their lack of jurisprudence.

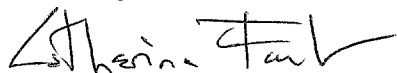
Waste injection is by no sense "reclamation." None of this wastewater should be finding it's way into any of the water banks.

Any well in which a tilt meter indicates a problem should be immediately shut down. Any field where a surface expression occurs should also be shut down. Chevron employee David Taylor's death in 2011 at the Midway-Sunset Field should have resulted in more stringent operating conditions and a more significant fine for Chevron rather than a SWDA \$350.00 slap on the pinky.

The oil and gas industry makes billions of dollars annually in profit. Rather than injections, on-site wastewater treatment plants should be constructed and powered by the oil and gas industry's own profit generating Co-Gen Plants. Any solid waste should be removed and disposed of in a facility licensed for the waste content. Once the water has been returned to it's original or better condition, then it could be injected.

As you know, water is essential to life. Maintaining water supply and quality should be our state's number 1 priority. Once an aquifer is poisoned, it can never be undone. There have already been too many injections into good quality water-injections which should have never occurred in the first place. Please seize this opportunity to stand-up and do what is right.

Sincerely,

A handwritten signature in black ink, appearing to read "Catherine Fowler", with a stylized flourish at the end.

Catherine Fowler